

**UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS**

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**AMANDA ARNOLD,**  
**Plaintiff**

**V.**

**THE WOODS HOLE, MARTHA'S  
VINEYARD AND NANTUCKET  
STEAMSHIP AUTHORITY**  
**Defendant**

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**Civil Action No.:**

**PLAINTIFF'S COMPLAINT AND DEMAND FOR A JURY TRIAL**

Now comes the Plaintiff, Amanda Arnold, and for her Complaint against the Defendant, Woods Hole, Martha's Vineyard and Nantucket Steamship Authority, states as follows:

**THE PARTIES**

1. The Plaintiff, Amanda Arnold, is a resident of New York City, New York County, State of New York.
2. The Defendant, Woods Hole, Martha's Vineyard and Nantucket Steamship Authority, is a corporation duly organized and existing under the laws of the Commonwealth of Massachusetts, and a resident of Woods Hole, County of Barnstable, Commonwealth of Massachusetts.

**JURISDICTION**

3. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 1332 as there is complete diversity of citizenship between the parties and the amount in controversy exceeds \$75,000.00.
4. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. § 1333.

**GENERAL FACTUAL ALLEGATIONS**

5. On or about September 30, 2016, the Plaintiff, Amanda Arnold, was a passenger lawfully aboard the M/V EAGLE.
6. On or about September 30, 2016, the Defendant, Woods Hole, Martha's Vineyard and Nantucket Steamship Authority, owned the M/V EAGLE.
7. On or about September 30, 2016, the Defendant, Woods Hole, Martha's Vineyard and Nantucket Steamship Authority, operated the M/V EAGLE.
8. On or about September 30, 2016, the Defendant, Woods Hole, Martha's Vineyard and Nantucket Steamship Authority, controlled the M/V EAGLE.
9. On or about September 30, 2016, the Defendant, Woods Hole, Martha's Vineyard and Nantucket Steamship Authority, chartered the M/V EAGLE from some other person or entity such that on or about September 30, 2016, the Defendant, Woods Hole, Martha's Vineyard and Nantucket Steamship Authority, was the owner *pro hac vice* of the M/V EAGLE.
10. On or about September 30, 2016, the M/V EAGLE was in navigable waters.
11. On or about September 30, 2016, while exiting a bathroom aboard the M/V EAGLE, the Plaintiff, Amanda Arnold, sustained severe personal injuries, when the restroom's heavy metal-door slammed shut on two fingers of her hand and her fingers were nearly completely severed.
12. Prior to and at the time she sustained the above-mentioned personal injuries, the Plaintiff, Amanda Arnold, was exercising due care.

**COUNT I—NEGLIGENCE/GROSS NEGLIGENCE**

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13. The Plaintiff, Amanda Arnold, reiterates the allegations set forth in paragraphs 1-12 above.

14. The personal injuries sustained by the Plaintiff, Amanda Arnold, were not caused by any fault on her part but were caused by the negligence and/or gross negligence of the Defendant, Woods Hole, Martha's Vineyard and Nantucket Steamship Authority, its agents, servants and/or employees, including, without limitation:

- a. The Defendant negligently failed to equip the heavy, metal restroom door with a safe closure slowing mechanism;
- b. The Defendant negligently failed to maintain the closure mechanism in the heavy, metal restroom door in a safe condition;
- c. The Defendant negligently failed to warn the Plaintiff of the risk of injury by the door;
- d. The Defendant negligently failed to provide the Plaintiff with adequate medical attention after she sustained her injury;
- e. The Defendant was further negligent or gross-negligent in other respects as may be revealed during discovery and shown at trial.

15. As a result of said personal injuries, the Plaintiff, Amanda Arnold, has suffered pain of body and anguish of mind, lost wages, lost time from her usual pursuits, incurred medical expenses, and has sustained and will sustain further damages as will be shown at trial.

**WHEREFORE**, the Plaintiff, Amanda Arnold, demands judgment against the Defendant, Woods Hole, Martha's Vineyard and Nantucket Steamship Authority, in an amount to be determined by a jury, together with interests and costs and other relief the court may find equitable.

**THE PLAINTIFF CLAIMS TRIAL BY JURY AS TO ALL ISSUES RAISED IN HER COMPLAINT**

Respectfully submitted for the  
the Plaintiff, Amanda Arnold,  
by her attorney,

/s/ Carolyn M. Latti  
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To be Admitted Pro Hac Vice

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Dated: March 15, 2017